Research Ethics Policy

1. Purpose

National College of Ireland (NCI) encourages the generation of knowledge through high-quality academic research. All staff and students conducting research at NCI must ensure that their work is ethically sound, complies with relevant national and international ethical standards, and protects the rights, dignity, and welfare of all involved.

This policy sets out the ethical guidelines to be followed by all students and staff undertaking research at NCI and the governance structures that provide oversight and ensure the ethical conduct of research. The steps to be followed for ethical review and approval are set out in the accompanying Research Ethics Procedure.

This Research Ethics Policy should be considered in conjunction with the principles, procedures, and ethical research practices outlined in the NCI Research Integrity Policy, and the principles and procedures outlined in NCI's Research Misconduct Procedures.

2. Scope

All researchers conducting projects that involve direct and/or indirect (e.g. online data collection) interaction with human participants, and/or use identifiable personal data, are required to reflect on any potential ethical issues and submit their research proposals for ethical review before commencing data collection.

This policy applies to all researchers who are engaged in research activities under the auspices of NCI, as defined in the Research Integrity Policy.

3. Definitions

3.1. Research

Research is a process to discover new knowledge, through systematic investigation. It is a process of gathering and analysing information, designed to develop or contribute to knowledge, increase or revise knowledge. Therefore, as per NCI's Code of Conduct for Researchers, the term research includes fundamental and applied research, scholarship, creative work, performance, composition and related activities. It includes the development of new tools and methods for teaching and learning based on scientific methods.

3.2. Researcher

Any individual engaged in research activities under the auspices of National College of Ireland (NCI). A researcher is a member of the NCI community (academic staff, research fellows, postdoctoral researchers, research assistants, research support officers, postgraduate or undergraduate students, exchange students, ELI staff, non-academic staff, collaborators working with NCI on funded or institutional research projects) who performs diligent and systematic inquiry or investigation into a subject in order to create knowledge, discover or revise facts, theories, applications, etc.

3.3. Ethics Committee and Filter Committees

The NCI Ethics Committee is a sub-committee of the Research and Innovation Committee, both established by Academic Council. The Ethics Committee oversees ethical issues arising from all research involving human participants that is conducted by students and staff of the College. The key purpose of this committee is to safeguard against any potential harm to participants, and to ensure that their rights are recognised in line with the guiding principles outlined in this document. Specifically, the Ethics Committee reviews and provides ethical approval for all projects conducted by NCI staff, and for any student projects that pose higher ethical risk and have been escalated for review by the relevant Filter Committee. Filter Committees for each discipline are established to provide initial review and approval for lower-risk student projects.

3.4. Ethical Approval

Ethical approval is the formal review process conducted by the NCI Ethics Committee to ensure that research involving human participants or identifiable personal data meets ethical guidelines. Ethical approval must be obtained in advance of conducting the research and will not be granted retrospectively. Applications may be exempt from ethical approval by the NCI Ethics Committee if prior approval has been obtained from another higher education institution.

3.5. Informed Consent

Informed consent refers to the voluntary agreement of participants to take part in a research study, based on full disclosure of the study's purpose, risks, and benefits. It is a fundamental ethical requirement for research involving human subjects.

3.6. Personal Data

Any information relating to an identified or identifiable natural person. A person is considered identifiable if they can be identified directly or indirectly, especially by reference to identifiers. Examples include name, home address, email address, IP address etc.

3.7. Sensitive Personal Data

Personal data that reveals highly private information about a person and therefore requires stronger protection and stricter processing rules. Examples include racial or ethnic origin, political opinions, religious or philosophical beliefs, genetic data, health data. This type of data is described as 'special categories of personal data' in GDPR legislation.

4. Policy Statement

The ethical conduct of research is fundamental to maintaining public trust in research and protecting the rights, dignity, and welfare of research participants. The ethical review processes established by the College are guided by the principles set out below, which provide a framework for assessing the ethical acceptability of research proposals and for supporting responsible research practice. These principles stem from the Belmont Report (1979) published by the National Commission for the Protection of Human Subjects of Biomedical and Behavioural Research. While it is recognised that these principles may be operationalised differently depending on the specific research discipline, it is recommended that these are consulted as a starting point for any research involving human participants.

Researchers should also consider the principles outlined in the Research Integrity Policy and, where applicable, should consult guidelines stemming from their own professional bodies (e.g. The Psychological Society of Ireland, British Educational Research Association (BERA) and European Early Childhood Education Research Association (EECERA) guidelines) when planning their research.

4.1. Guiding Principles

4.1.1. Principle 1: Respect for persons

This principle entails recognition that participants should be treated as autonomous individuals and hence should never be coerced or swayed into participating in a research project against their will. The participant's right to withdraw from a research study at any time should be respected, as well as their right to dignity and protection from harm.

Respect for individuals can often be implemented in practice via the process of informed consent, whereby potential participants are made fully aware of the requirements involved in participation. While it is recognised that in certain cases deception (i.e. the withholding of certain information from participants) may take place, this should only occur when it is robustly justified for the validity of the research. In cases where deception is justified, researchers should ensure that any potential risk resulting from this measure is minimised. Participants should also be fully debriefed on the nature of the research after it has taken place.

The principle of respect also requires researchers to protect vulnerable participants who may have diminished autonomy (see Vulnerable Groups below for more detail as to what constitutes vulnerable groups). Where full informed consent is not possible for such groups, consent may instead be sought from their guardians. In all cases however clear assent, or willingness to participate, should be demonstrated from participants.

4.1.2. Principle 2: Beneficence and non-maleficence

This principle specifically focuses on the need to protect the well-being of participants. Any potential risk to participants should be minimised, whether that be risk of physical discomfort or of any psychological, emotional, or social distress, while possible benefits should be maximised. Researchers adhering to this principle should thus ensure that any potential benefits derived from carrying out the study (e.g. in terms of knowledge gained) should outweigh potential risks. Even in cases where there is only a slight potential risk of harm, participants should be provided with appropriate support to alleviate this.

4.1.3. Principle 3: Justice

This principle emphasises the need to employ fairness in inclusion and the distribution of benefits and risks to participants. The way in which participants are selected to take part in research should relate to the purpose of the study, as opposed to other factors such as availability or manipulability of participants. Any exploitation of vulnerable populations should be avoided.

4.2. Categorisation of Ethical Risk

For projects involving human participants, ethical review of research proposals will be guided by the risk categorisation outlined below.

4.2.1. Research Category A

Research in this category poses minimal ethical risk to the participants involved. It is considered unlikely to cause discomfort greater than usual daily life. In some circumstances (e.g. large volume of student projects) Filter Committees may implement expedited review processes for minimal-risk projects (Category A). Minimal risk is defined based on the following principles:

- Participants are adults capable of giving informed consent, and no vulnerable populations (e.g. children, individuals with cognitive impairments) are involved.
- Data collected does not relate to sensitive topics (e.g. health, trauma, illegal behaviour) and no sensitive personal data is collected.
- Participants are not exposed to risk of physical, psychological, social, or legal harm.

- Informed consent is obtained, and participants can withdraw at any time without consequence.
- The research involves minimal intrusion, such as surveys, interviews (non-sensitive topics), or observation of public behaviour.
- Data collected are anonymised or de-identified.
- The project does not involve deception (actively misinforming or purposefully not fully informing participants about the true purpose of the research and/or what participation entails).

4.2.2. Research Category B

Research in this category involves human participants with a moderate-to-high level of risk. Projects are defined as moderate-to-high risk based on any of the following principles:

- Participants are minors (aged under 18).
- The project will recruit participants who are from vulnerable groups (see Vulnerable Groups below).
- The data collected includes sensitive topics (e.g. illegal activity, health, trauma etc.).
- The project poses any significant risk to participants (physical, social, and/or psychological).
- The project involves therapeutic interventions.
- The project involves new research methodologies.
- The project involves invasive procedures (e.g. biological sampling).
- The project involves deception (actively misinforming or purposefully not fully informing participants about the true purpose of the research and/or what participation entails). Note deception must be fully disclosed and justified with an appropriate debriefing process.

4.3. Vulnerable Groups

There are some participant populations that may fall under the heading of "vulnerable groups". These groups require consideration of unique ethical challenges regardless of the nature of the project. Research involving such populations should therefore always be reviewed by the Ethics Committee.

Groups that may be classed as vulnerable include, but are not limited to:

- Children (under 18 years of age)
- People confined to institutions (e.g. prisoners, residents in 24-hour nursing facilities)
- People with a language difficulty

- People with an intellectual or learning disability, or neurological condition that may impact capacity to consent
- Certain groups of very elderly people (with physical or cognitive impairment)
- Those in a subordinate position to and/or people in dependent or unequal relationships with the researcher (e.g. employees, teacher/lecturer-student, therapist-client)
- Any other groups who might not understand the research and consent process

Research that involves vulnerable groups requires careful consideration of informed consent, including, where appropriate, proxy consent from a legally authorised person along with assent from the participant.

Note: in addition to the ethical review process, any researchers intending to work directly with children will be required to undergo Garda Vetting in advance of the proposed research. All requirements under child protection legislation and procedures must be in place and observed.

4.4. Ethical Considerations in AI and Data-Driven Research

Research involving artificial intelligence, machine learning, automated decision systems, and large-scale data analysis presents specific ethical considerations beyond those associated with traditional research methods. Researchers conducting AI or data-driven research should ensure that their work is conducted in accordance with the following principles.

4.4.1. Transparency and Explainability

Researchers should ensure that AI systems used in research are transparent where possible, and that their design, training data, and decision processes can be explained and scrutinised where appropriate.

4.4.2. Fairness and Bias

Researchers must consider whether training data, algorithms, or modelling choices may introduce bias or discriminatory outcomes. Steps should be taken to assess and mitigate algorithmic bias where possible.

4.4.3. Data Governance

Researchers must ensure that data used for training or evaluation of AI models has been obtained ethically and lawfully. Where personal data is used, researchers must comply with relevant data protection legislation including the General Data Protection Regulation (GDPR).

4.4.4. *Accountability*

Researchers remain responsible for verifying the accuracy, reliability, and integrity of outputs generated by AI or automated analytical tools used in the research process. The use of automated methods does not remove the responsibility of the researcher to ensure ethical conduct.

4.4.5. *Human Impact*

Where AI systems may influence decisions affecting individuals or groups, researchers must consider potential societal impacts, including risks of discrimination, privacy violation, or unintended harms.

4.4.6. *Responsible Use of Generative AI*

Researchers using generative AI systems must ensure that the tools are used in a transparent manner, that generated content is appropriately validated, and that authorship and intellectual contributions are clearly attributed.

Where AI systems are used as part of research methodology, their role should be clearly documented in the research design and methodology sections of the research proposal. Where datasets are obtained from publicly available sources, researchers must ensure that their use complies with applicable legal, licensing, and ethical requirements. The Ethics Committee may request additional information or safeguards where AI or automated decision systems are used in research involving human participants or personal data.

4.5. Ethics Governance

NCI has established a structured governance framework to oversee ethical standards in research conducted by staff and students. This framework ensures that research involving human participants and personal data is reviewed at a level proportionate to its ethical risk, and that ethical principles are upheld across all research activities undertaken under the auspices of the College.

The Ethics Committee is a sub-committee of the Research and Innovation Committee and provides institutional oversight of research ethics. It is supported by School-based Filter Committees, which provide initial review of student research. The composition, remit, and operating arrangements of the Ethics Committee and the Filter Committees are set out in the Ethics Committee Terms of Reference.

4.5.1. *Scalable governance framework*

Ethics governance operates as a scalable framework so that research proposals are reviewed at the appropriate level of oversight relative to their ethical risk, while maintaining efficient review processes and protecting the rights and welfare of research participants. The framework operates across three levels of review: supervisor screening of student projects, Filter Committee review, and Ethics Committee review.

4.6. Scope of Ethical Approval

Ethical approval applies only to the research activities described in the approved application. Any substantive changes to the research design, participant recruitment, research procedures, or data collection methods must be submitted to the Ethics Committee for review and approval prior to implementation. Researchers must not implement such changes until approval for the amendment has been granted.

5. Roles and Responsibilities

Responsibility for the ethical oversight of research at NCI is distributed across the structures below. The detailed responsibilities of the Ethics Committee and Filter Committees are set out in the Ethics Committee Terms of Reference. The detailed responsibilities of researchers are set out in the Research Ethics Procedure.

- **Ethics Committee**: provides institutional oversight of research ethics, reviews and approves staff research and escalated student research, and acts as the final body of appeal in matters concerning research ethics governance.
- **Filter Committees**: provide initial review of student research, review lower-risk (Category A) student projects, and escalate higher-risk projects to the Ethics Committee.
- **Research Supervisors:** support students through the ethics application process and provide initial screening of student research proposals.
- **Researchers**: are responsible for ensuring that their research is conducted in accordance with the conditions of ethical approval granted by the College and with this policy.

6. Compliance & Monitoring

Researchers must not commence participant recruitment and/or data collection until the required ethical approval is in place. Compliance with the conditions of ethical approval is monitored by the Ethics Committee.

Failure to conduct research in accordance with the approved ethics application, or to obtain approval for substantive amendments, may result in the suspension or withdrawal of ethical approval and may be referred for consideration under the College's Research Integrity Policy and Research Misconduct Procedures.

Where concerns arise that may indicate potential research misconduct, the matter will be referred in accordance with the National College of Ireland Research Misconduct Procedures and the Research Integrity Policy. The steps for escalation are set out in the Research Ethics Procedure.

This policy is subject to periodic review to align with best practice, normally every three years. This review will usually be led by the office of the Vice President for Research and Academic Affairs. Amendments may be made based on feedback from faculty and research stakeholders.

7. Related Documentation

- Research Ethics Procedure
- Ethics Committee Terms of Reference
- NCI's Research Misconduct Procedures
- NCI's Code of Conduct for Researchers
- NCI Intellectual Property Policy
- Academic Integrity at NCI
- NCI's Data Protection Policy
- Student Disciplinary Policy - National College of Ireland
- National Policy Statement on Ensuring Research Integrity in Ireland (2024)
- The European Code of Conduct for Research Integrity (2023)
- Psychological Society of Ireland Code of Professional Ethics
- European Early Childhood Education Research Association
- European Educational Research Association
- British Educational Research Association

Version Control

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procedural content moved to the Research Ethics Procedure and committee content moved to the Ethics Committee Terms of Reference.